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17 *Attorneys for Defendant*

18 IN THE UNITED STATES DISTRICT COURT
19 FOR THE NORTHERN DISTRICT OF CALIFORNIA
20 SAN FRANCISCO DIVISION

21 ALEX ANG and LYNN STREIT,
22 individually and on behalf of all others
similarly situated,

23 Plaintiffs,

24 v.

25 BIMBO BAKERIES USA, INC.,

26 Defendant.
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Case No. 3:13-CV-1196-HSG (NC)

**STIPULATED REQUEST FOR ORDER
CHANGING TIME [RE: DKT. NO. 154];
AND ~~PROPOSED~~ ORDER**

Judge: Hon. Haywood S. Gilliam, Jr.
Action Filed: March 18, 2013

1 Pursuant to Local Civil Rule 6-2, it is hereby stipulated and agreed, by and among the
2 undersigned counsel for Plaintiffs Alex Ang and Lynn Streit (“Plaintiffs”) and Defendant Bimbo
3 Bakeries USA, Inc. (“Defendant”), as follows:

4 WHEREAS, at the hearing before this Court on August 20, 2015, the Court recognized
5 that the expert discovery schedule may need to be modified so that experts will be able to prepare
6 their reports with the benefit of a decision on the pending motion for class certification (*see*
7 Hearing Transcript, 8/20/2015, at 13:3-15); and

8 WHEREAS, the Court thereafter entered a Scheduling Order (Dkt. No. 147); and

9 WHEREAS, the parties previously agreed that the Scheduling Order should be modified
10 so that expert reports and dispositive motions could be made with the benefit of a decision on the
11 class certification and, on September 21, 2015, submitted a proposed stipulation to modify the
12 scheduling order (Dkt. No. 151); and

13 WHEREAS, on October 5, 2015, the Court entered an order approving that stipulation
14 (Dkt. No. 154); and

15 WHEREAS, the motion for class certification and Defendant’s motion for sanctions
16 remain pending; and

17 WHEREAS, the parties have agreed that, for the reasons that the scheduling order was
18 previously modified, each date set forth in the current Scheduling Order should be postponed for
19 approximately three months.

20 NOW, THEREFORE, IT IS HEREBY STIPULATED and respectfully requested by the
21 parties through their respective attorneys of record that the Court amend the Scheduling Order
22 (Dkt. No. 154) to reflect the following dates:

- 23 • Close of Fact Discovery: February 12, 2016
- 24 • Mutual Exchange of Expert Disclosures: February 19, 2016
- 25 • Mutual Exchange of Rebuttal Expert Disclosures: March 18, 2016
- 26 • Close of Expert Discovery: April 15, 2016
- 27 • Dispositive Motions Filing Deadline: April 22, 2016
- 28 • Opposition Filing Deadline: May 20, 2016

- Reply Filing Deadline: June 7, 2016
- Dispositive Motions Hearing: June 23, 2016 at 2:00 p.m.
- Pretrial Conference: September 13, 2016 at 3:00 p.m.
- Trial Date: September 26, 2016 at 8:30 a.m.

Dated: November 12, 2015

/s/ Bradley F. Silverman

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Attorneys for Defendants

PROPOSED ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED

DATED: November 13, 2015


HON. HAYWOOD S. GILLIAM, JR.
UNITED STATES DISTRICT JUDGE

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Attestation Regarding Signatures

I hereby attest that Mark C. Goodman, counsel for the defendant, authorized the filing of this document on November 12, 2015.

/s/ Bradley F. Silverman
Bradley F. Silverman